

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

JOE HOLCOMBE, *et al.*,)
Plaintiffs,)
v.) CIVIL ACTION NO. 5:18-cv-555-XR
UNITED STATES OF AMERICA,) (consolidated cases)
Defendant.)

**DEFENDANT UNITED STATES OF AMERICA'S DEPOSITION
DESIGNATIONS OF TESTIMONY PROVIDED BY EMPLOYEES OF ACADEMY,
LTD. AND STURM, RUGER & COMPANY, INC.**

Defendant submits the following designations of testimony given by employees of Academy, Ltd. (Academy) and Sturm, Ruger & Company, Inc. (Ruger). Pursuant to the Agreed Protective Order and Confidentiality Agreement (Agreement) entered into between Academy and the United States, *see* ECF No. 184-1, the United States will file the excerpts of the testimony from the five depositions in camera. The United States will also file in camera Academy's responses to the Government's Deposition by Written Questions. Per the terms of the Agreement, on March 11, the Government contacted counsel for Academy to state its intent to file pleadings that contain Confidential Information. The Government has yet to receive a response to its correspondence.

Academy Witness P.D.

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12:3–13:14

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20:4–21:7 [JEX 81]

23:20–24:2 [JEX 81]

26:11–27:1 [JEX 80]

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136:11–13 [JEX 82]

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143:16–144:7 [JEX 82]

146:7–24 [JEX 82]

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156:1–22 [JEX 83]

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167:16–168:1 [JEX 83]

174:5–175:23 [JEX 83]

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182:9–183:20 [JEX 83]

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267:12–24 [JEX 81]

268:23–269:6 [JEX 82]

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Academy Witness W.F.

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44:17–45:15 [JEX 79]

48:2–14 [JEX 76]

52:16–54:1 [JEX 74]

66:7–23 [JEX 82]

67:20–68:16 [JEX 82]

69:8–70:10 [JEX 82]

72:2–18 [JEX 84]

73:14–22 [JEX 84]

74:20–76:25 [JEX 84]

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109:13–21

116:3–16

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Academy Witness N.M.

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24:14–22

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37:10–38:25

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100:15–19

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128:22–129:4

164:19–22

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Academy Witness R.C.

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11:9–14

15:11–15

16:10–16

25:6–27:4

54:24–57:25 [JEX 85]

91:19–92:3 [JEX 84]

92:19–23

Ruger Witness K.R.

10:11–21

11:25–12:18

15:14–16:4

33:11–34:25

35:7–36:7

48:5–14

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62:18–64:19

175:9–178:11 [JEX 82]

300:5–301:7

Dated: March 12, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on March 12, 2021, I electronically filed the foregoing with the clerk of court by using the CM/ECF system, and that all counsel of record have received notice and been served through that system.

/s/ Paul David Stern
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